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Attorney for John Tam, Jamie Yang,
and Corey Fong

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ACTIVISION PUBLISHING, INC., a
Delaware corporation.

} Case No. C 07-03536 MEJ

Plaintiff,

VS.

JOHN TAM, an individual, JAMIE YANG, an individual, et al.,

Defendants.

) ADMINISTRATIVE MOTION TO FILE
) UNDER SEAL UNREDACTED MOTION
) FOR ORDER DETERMINING A GOOD
) FAITH SETTLEMENT BETWEEN
) PLAINTIFF AND DEFENDANTS JOHN
) TAM, JAMIE YANG AND COREY FONG,
) AND DECLARATIONS OF RICHARD
) CAULEY AND YEE-HORN SHUAI ; AND
) TO FILE UNREDACTED REPLY TO
) OPPOSITION TO MOTION FOR ORDER
) DETERMINING A GOOD FAITH
) SETTLEMENT BETWEEN PLAINTIFF
) AND DEFENDANTS JOHN TAM, COREY
) FONG AND JAMIE YANG; AND
) DECLARATIONS OF JOHN TAM, JAMIE
) YANG AND COREY FONG SUPPORT
) THEREOF;
)
) DECLARATION OF YEE-HORN SHUAI
) [filed concurrently herewith] ; AND
)
) [PROPOSED] ORDER
)
) Date: August 30, 2007
) Time: 10:00 AM
) Dept.: Courtroom B, 15th Fl.
) Judge: Honorable Maria-Elena James

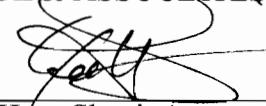
Pursuant to Civil Local Rule 79-5, Defendants John Tam, Jamie Yang and Corey Fong (hereinafter collectively “Tam Defendants”) hereby submit their Administrative Motion to File Under Seal Their unredacted Motion for Order Determination Good Faith Settlement between

1 Plaintiff and John Tam, Jamie Yang and Corey Fong (Motion), Declarations of Richard Cauley
2 and Yee-Horn Shuai (Declarations 1); **and** unredacted Reply to Oppositions to Motion for Order
3 Determining Good Faith Settlement (“Reply”) and the Declarations of Jamie Yang, John Tam,
4 Corey Fong and Yee-Horn Shuai (“Declarations 2”) in support thereof, because those documents
5 contain information regarding confidential settlement agreements entered into by and between
6 the parties, as well as confidential financial information, such as salary information, that must
7 remain confidential in order to protect the privacy of those individuals.

8 The parties have all agreed to maintain the confidentiality of said information, and thus
9 the Tam Defendants respectfully request that the unredacted Motion , Reply and the Declarations
10 1 and 2 be filed under seal.

11 Dated: August 15, 2007

SHUAI & ASSOCIATES



12
13 Yee-Horn Shuai, Attorney for defendants
14 John Tam, Corey Fong and Jamie Yang

16 **IT IS SO ORDERED:**

17 Dated: _____

18 Honorable Maria Elena James
19 Judge of the United States District Court

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5 Attorney for John Tam, Jamie Yang,
6 and Corey Fong

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

10 ACTIVISION PUBLISHING, INC., a)
Delaware corporation,) Case No. C 07-03536 MEJ
11)
12 Plaintiff,) DECLARATION OF YEE-HORN SHUAI IN
vs.) SUPPORT OF ADMINISTRATIVE
13) MOTION TO FILE UNDER SEAL
14 JOHN TAM, an individual, JAMIE YANG, an) Date: August 30, 2007
individual, et al.,) time: 10:00 AM
15 Defendants.) Dept.: Courtroom B, 15th Floor
16) Judge: Maria Elena James
17)

I, Yee-Horn Shuai, hereby declare as follows:

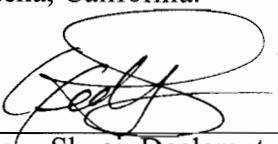
1. I am an attorney at the law firm of Shuai & Associates, attorneys for the defendant John Tam, Jamie Yang and Corey Fong (hereinafter collectively "Tam Defendants"). I make this declaration in support of Tam Defendants' Administrative Motion to File Under Seal. I have personal knowledge of the following, and if called upon as a witness, I could and would competently testify thereto.

2. The Motion for Order Determining Good Faith Settlement between Plaintiff and Defendants John Tam, Jamie Yang and Corey Fong ("Motion") and the Declarations Richard Cauley and Yee-Horn Shuai ("Declarations 1"); and Reply to Oppositions to Motion for Order Determining Good Faith Settlement ("Reply") and the Declarations of Jamie Yang, John Tam, Corey Fong and Yee-Horn Shuai ("Declarations 2") in support thereof, contain information regarding confidential settlement agreements entered into by and between the parties, as well as

1 confidential financial information, such as personal financial conditions information, that must
2 remain confidential in order to protect the privacy of those individuals. The parties to this
3 lawsuit have all agreed to maintain the confidentiality of said information, and have designated
4 the documents attached as Exhibits A-D to the Declaration to Richard Cauley as being
5 confidential, pursuant to the Joint Stipulated Protective Order signed by all of the parties and so
6 ordered by the United States Magistrate Judge on January 31, 2007.

7 I certify and declare under penalty of perjury under the laws of the State of California that
8 the forgoing is true and correct.

9 Dated this 15th day of August 2007, at Pasadena, California.

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11 Yee-Horn Shuai, Declarant

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